

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***COMMENTS AND RESPONSE***  
**ON THE DRAFT PERMIT**

Comments on Kellogg's Snacks Draft Conditional Major Air Quality Permit submitted by Mike Millmier, Kellogg's Snacks - Plant Manager

**Draft Permit**

1. We have reviewed the draft permit and generally agree with its terms. However, we request to substitute EPA Method 18 in place of Method 25 as the test requirement for VOC emissions. The test requirement was included in order to demonstrate the partial retention of propylene glycol in the facility's products. Several of the facility's products result in emissions of both ethanol and propylene glycol, however, and testing at similar facilities has indicated that some fraction of the ethanol is also retained. While we have not claimed this degree of ethanol retention in our emission calculations, it is likely present, and its effect could confuse calculations of propylene glycol retention based on a Method 25 test alone. Using Method 18 allows for the individual organic components of the exhaust to be quantified separately, which would ensure that any subsequent calculation of propylene glycol retention rates is as accurate as possible. Changing the required test from Method 25 to Method 18 would ensure the reliability of the test results without altering the applicability or stringency of any other requirement of the draft permit.

*Division's response: The Division concurs that Method 18 may be used a substitute to determine emissions of propylene glycol. Method 18 will allow Kellogg to use gas chromatography to separate the components of VOC emissions; individually identify them and approximate their concentrations. It is our understanding that Kellogg's will continue to assume all ethanol is released as VOC, and that facility will only use the test results to determine propylene glycol retention not ethanol retention.*

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.